

May 10, 2002

Mr. John Bawcum
The Braun Corporation
PO Box 310
Winamac, IN 46996

Re: **131-14480-00017**
Significant Permit Modification to:
Part 70 permit No.: **T 131-7058-00017**

Dear Mr. Bawcum:

The Braun Corporation was issued Part 70 operating permit T 131-7058-00017 on April 20, 1999 for a stationary motor vehicle conversion plant. A letter requesting changes to this permit was received on June 1, 2001. Pursuant to 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The Office of Air Quality has determined that the following changes shall be made to the permit to allow operation of the surface coating booths without their respective dry filters as a means of PM emission control:

- (a) Condition D.1.4 (now Condition D.1.3) is amended to specify that existing stack test data may be used to satisfy the testing requirements of Condition D.1.3 provided the Office of Air Quality is satisfied that said testing is acceptable.
- (b) The preventive maintenance plan requirements of Condition D.1.3 have been removed because stack tests have been conducted that demonstrate that the dry filter systems (control equipment) are not necessary to achieve compliance with the 326 IAC 6-3 PM limits. Therefore, the dry filter systems are not considered control devices and no preventive maintenance plan for these devices is necessary.
- (c) The record keeping requirements of Condition D.1.6 (now Condition D.1.4) have been amended to reflect only the records that need be kept. The monthly purchase orders and invoices record keeping requirements are removed because there are no emission rate limits that require records of the amount of coatings applied. A list of the coatings and the "as supplied" and "as applied" VOC data sheets are required because the data obtained from these helps demonstrate compliance with the limits of Condition D.1.2.
- (d) The solids content record keeping requirements of Condition D.1.5 have been removed and the testing requirements of Condition D.1.3 amended because it is determined that changing the testing requirements to require stack testing whenever a coating is used that has a solids content greater than what was tested for in the most recent stack test will ensure that the PM and PM10 emissions from the coating booths will not exceed the levels established in the most recent compliance stack test. Compliance with the PM overspray limits of 326 IAC 6-3 will therefore always be demonstrated, eliminating the need for recording the solids content of the coatings applied.

All other conditions of the permit shall remain unchanged and in effect. The permit has been redrafted to include all changes made to the source to date.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter contact Scott Fulton, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 317-233-5691 or in Indiana at 1-800-451-6027 (ext 3-5691).

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

SDF

cc: File - Pulaski County
U.S. EPA, Region V
Pulaski County Health Department
Air Compliance Section Inspector - Eric Courtright
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**The Braun Corporation
623 West 11th Street
Winamac, Indiana 46996**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T131-7058-00017	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 20, 1999
First Significant Permit Modification 131-10831	Issuance Date: August 2, 1999
First Administrative Amendment 131-11117	Issuance Date: September 14, 1999
Second Administrative Amendment AAT 131-12100	Issuance Date: April 20, 2000
Second Significant Permit Modification 131-11788	Issuance Date: June 7, 2000
Third Significant Permit Modification 131-12887	Issuance Date: May 7, 2001
Fourth Significant Permit Modification 131-14480	Pages Affected: 32 and 33
Issued by: Original Signed Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 10, 2002

- (b) Contact adhesives in the Bus/ParaTransit Van assembly areas (Para/Assem. No. 1 and Para/Assem. No. 2) are applied to wood substrates and could be subject to 326 IAC 8-1-6, but are exempt because potential VOC emissions from each production facility are below 25.0 TPY. Any change or modification to any production facility that may cause potential emissions of VOC to increase to 25 tons per year, shall require prior approval by OAQ and use of Best Available Control Technology.
- (c) The refinishing surface coating booths (Enter/Ref. No. 1, Enter/Ref. No. 2, Para/Ref. No. 1 and Para/Ref. No. 2) are exempt from the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) by 326 IAC 8-2-9(b)(3), because they are auto refinishing operations. These operations could be subject to 326 IAC 8-1-6 (BACT), but are exempt because each production facility has potential VOC emissions less than 25 tons per year. Any change or modification to any production facility that may cause potential emissions of VOC to increase to 25 tons per year, shall require prior approval by OAQ and use of Best Available Control Technology.
- (d) For the purposes of enforcing Conditions D.1.2(b) and D.1.2(c), a production facility is defined as one EnterVan or Bus/ParaTransit Van production line, consisting of one (1) assembly area, one (1) refinishing surface coating area and one (1) undercoating area. Each production line at the source operates independently of all other lines and is treated as a separate facility.
- (e) The application of adhesives to wood substrates in the EnterVan and Bus/ParaTransit Van assembly areas (Enter/Assem. No. 1, Enter/Assem. No. 2, Para/Assem. No. 1 and Para/Assem. No. 2) is exempt from 326 IAC 8-2-12 because these coatings are applied to rough structural plywood on the bus and van floors, which are not considered furniture.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period within 90 days after the issuance of this permit, in order to demonstrate compliance with Condition D.1.1, the Permittee shall perform PM testing of one (1) EnterVan line and One (1) Bus/ParaTransit Van line utilizing methods as approved by the Commissioner.

This PM test needs to be performed on the Bus/ParaTransit Van line while a bus is being painted and also while a paratransit van is being painted.

The owner or operator may use existing compliance stack test data to satisfy the testing requirements of this Condition provided said test results are deemed acceptable by the Office of Air Quality.

Should the owner or operator change any "as applied" coating applied at any unit subject to the requirements of Condition D.1.1 such that the solids content of said coating exceeds the levels utilized in the most recent accepted compliance stack tests, the owner or operator shall schedule and perform new compliance stack tests utilizing the methodologies specified in this Condition, and demonstrate compliance with the requirements of Condition D.1.1 before any such change in coating is made.

The compliance stack tests required in this Condition shall be performed no later than five (5) years from the date of the most recent previous valid compliance demonstration, with said testing being conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.4 Record Keeping Requirements

To document compliance with Condition D.1.2(a), the Permittee shall maintain a one time summary list of all coatings applied at each affected area, and including for each applicable coating, copies of its:

- (a) "as supplied" VOC data sheets, and
- (b) worst case scenario "as applied" VOC data sheets.

Said records shall be updated on an as needed basis with the records being updated when a new coating is introduced or the most recent worst case "as applied" scenario of any coating is exceeded.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Modification to an Existing Title V

Source Background and Description

Source Name:	The Braun Corporation
Source Location:	623 West 11th Street, Winamac, Indiana 46996
County:	Pulaski
SIC Code:	3711
Operation Permit No.:	T 131-7058-00017
Operation Permit Issuance Date:	April 20, 1999
Significant Permit Modification No.:	131-14480-00017
Permit Reviewer:	Scott D. Fulton
Source Name:	The Braun Corporation

The Office of Air Quality (OAQ) has reviewed an application from The Braun Corporation relating to the resolution of issues raised in an appeal to Third Significant Permit Modification (131-12887-00017), issued on May 7, 2001.

Request

On June 1, 2001, The Braun Corporation submitted an application for a significant permit modification to Third Significant Permit Modification (131-12887-00017), issued on May 7, 2001.

Since the changes to the permit result in removal of existing conditions, the proposed changes shall be incorporated into the permit via a significant permit modification pursuant to 326 IAC 2-7-12(d)(1) which states that any relaxation of reporting or record keeping permit terms or conditions shall be considered significant.

Existing Approvals

The source was issued a Part 70 permit on April 20, 1999 with modifications being made as follows:

1. First Significant Permit Modification 131-10831-00017 was issued on August 2, 1999.
2. First Administrative Amendment 131-11117-00017 was issued on September 14, 1999.
3. Second Administrative Amendment 131-12100-00017 was issued on April 20, 2000.
4. Second Significant Permit Modification 131-11788-00017 was issued on June 7, 2000.
5. Third Significant Permit Modification 131-12887-00017 was issued May 7, 2001

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the changes due to this proposed appeal resolution be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and information obtained during a meeting on October 16, 2001 between the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and representatives from The Braun Corporation.

Appeal Resolution Issues

The following is a description of the issues raised by The Braun Corporation and the changes that result. New language is in bold type and deleted language is struck out.

1. Issue 1:

The Braun Corporation is concerned that Permit Condition D.1.4 is not clear in establishing the Compliance Data Section's authority to accept stack tests that have been performed prior to the permit issuance date of May 7, 2001 in lieu of new stack tests.

Response 1:

Upon review of Condition D.1.4 and discussions with The Braun Corporation, it is determined that Condition D.1.4 can be amended as follows to better describe the intent of the condition.

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period within 90 days after the issuance of this permit, in order to demonstrate compliance with Condition D.1.1, the Permittee shall perform PM testing of one (1) EnterVan line and One (1) Bus/ParaTransit Van line utilizing methods as approved by the Commissioner.

This PM test needs to be performed on the Bus/ParaTransit Van line while a bus is being painted and also while a paratransit van is being painted. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

The owner or operator may use existing compliance stack test data to satisfy the testing requirements of this Condition provided said test results are deemed acceptable by the Office of Air Quality.

2. Issue 2:

The Braun Corporation has also submitted a request to remove the preventive maintenance plan requirement of Condition D.1.3 because the source has compliance stack tests demonstrating the dry filter systems of the applicable booths are not necessary to achieve compliance PM overspray limits of Condition D.1.1.

Response 2:

Condition D.1.3 was left in the Third Significant Permit Modification (131-12887-00017), issued on May 7, 2001 because the stack testing that was to be performed to demonstrate that the dry filter systems of the applicable booths are not necessary to achieve compliance with the PM overspray limits of Condition D.1.1 had not been conducted.

The tests have since been conducted and have demonstrated that the dry filter systems are not necessary to achieve compliance. Thus, the dry filter systems are determined to be not control devices and no preventive maintenance plan is required of these systems. Condition D.1.3 shall therefore be removed.

~~D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.~~

3. Issue 3:

The Braun Corporation believes that Condition D.1.6(a) should be revised to allow demonstration of compliance with the VOC emission limitations via VOC data sheets or the MSDS for the applicable coatings.

Response 3:

Upon review of Condition D.1.6(a) and the VOC limits of Condition D.1.2(a), it is determined that only records of the worst case "as applied" VOC content need be kept to demonstrate compliance with the 326 IAC 8-2-9 limits. Condition D.1.6(a) currently requires records of the coatings applied each month, monthly records of the "as applied" VOC content of each coating applied, and purchase orders, invoices, and material safety data sheets.

The monthly purchase orders and invoices are not necessary because Condition D.1.2(a) does not establish any usage limits that require records of the amount of coatings applied. Thus, the purchase order and invoice requirements shall be removed.

A list of the coatings applied at each affected area, however, is necessary. This materials list will serve as a quick look summary that will aid the inspector in sorting out the VOC data sheets and MSDS that need to be reviewed during an inspection. This list shall consist simply of the names of all coatings that could be applied at the affected area. Maintenance of these lists shall consist of updating the list whenever new coatings are added. Updating the affected lists when coatings are removed is optional.

In addition, instead of requiring monthly updates of the VOC data sheets and MSDS, the source shall be required to keep one time "as supplied" VOC data sheets for each coating and one time worst case scenario "as applied" VOC data sheets for each coating. The source will not be required to keep the MSDS for each coating.

The "as supplied" VOC data sheets will provide the properties of each coating as supplied by the manufacturer. Copies of the completed "as supplied" VOC data sheets can be obtained from the coating manufacturer. Although the MSDS and "as supplied" VOC data sheets provide the material properties that are necessary to meet the requirements of Condition D.1.2(a), the "as supplied" VOC data sheets are required in lieu of the MSDS because the information provided in the VOC data sheets is more readily accessible by the inspector.

The "as applied" VOC data sheets will provide the information necessary to demonstrate compliance with the 326 IAC 8-2-9 VOC content limit of Condition D.1.2(a). The "as applied" VOC data sheets shall reflect the worst case "as applied" scenario for each affected coating. Requiring the owner or operator to keep a copy of the worst case "as applied" scenario for each affected coating will reduce the amount of records that need to be kept by reducing the frequency of updates that are necessary to demonstrate compliance with the 326 IAC 8-2-9 limits. Requiring copies of the "worst case" scenario "as applied" means only one set of sheets for each coating need be drafted because demonstrating compliance with the worst case scenario will demonstrate compliance with all possible "as applied" variations. As with the "as supplied" VOC data sheets, the worst case "as applied" VOC data sheets can be obtained from the manufacturer.

No records regarding the solvents used will be required because:

- (a) there are no production limits associated with Condition D.1.2(a), and
- (b) the worst case "as applied" VOC data sheets will provide all necessary information regarding any thinning of the coatings that takes place.

Therefore the record keeping requirements of Condition D.1.6(a) shall be amended as follows:

D.1.6 Record Keeping Requirements

To document compliance with Condition D.1.2(a), the Permittee shall maintain a one time summary list of all coatings applied at each affected area, and including for each applicable coating, ~~records~~ **copies** of its: ~~the VOC content of each coating material, as applied. The records shall include the coatings applied during each month, the VOC content of each coating as applied, and purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the coating type.~~

- (a) "as supplied" VOC data sheets, and**
- (b) worst case scenario "as applied" VOC data sheets.**

Said records shall be updated on an as needed basis with the records being updated when a new coating is introduced or the most recent worst case "as applied" scenario of any coating is exceeded. ~~maintained on a monthly basis and shall be complete and sufficient to establish compliance with the VOC emission limits established for coating of metal substrates in Condition D.1.2(a).~~

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Issue 4:

Paragraphs (a) and (c) of Permit Condition D.1.5 should be deleted because no solids content limits or record keeping is necessary to demonstrate compliance with the PM limits of Condition D.1.1 on a continuous basis.

Response 4:

In order for the PM overspray limits of Condition D.1.1 to be federally enforceable, compliance must not only be demonstrated initially, but also on a more or less continuous basis. The Braun Corporation has established initial compliance through compliance stack testing.

The Third Significant Permit Revision (131-12887-00017), issued on May 7, 2001, established limits on the solids content of each coating to ensure that the source will not utilize coatings that exceed the solids content of the coatings utilized in the compliance stack tests. If the source utilizes coatings with solids contents greater than the levels used in the compliance stack tests, compliance with the limits of Condition D.1.1 will no longer be demonstrated.

However, upon contemplation of the issue, it was determined that there might be a way to ensure initial as well as continuous compliance without requiring limits and record keeping of the solids contents of the coatings.

Initial compliance with the PM overspray limits of Condition D.1.1 has already been established by performing compliance stack tests utilizing the worst case solids content of the affected coatings. Continuous compliance will be demonstrated by requiring the source to perform new compliance

stack tests any time the solids content of any affected coating to be utilized by the source exceeds the levels utilized in the most recent accepted compliance stack test.

This requirement will ensure one of two things; the solids content of the coatings will not, at any time, exceed those utilized in the compliance stack tests, or require the source to demonstrate compliance with the PM overspray limit before they switch to a coating that has a higher solids content than the levels utilized in the most recent compliance stack tests. In both cases, continuous compliance with the PM overspray limits of Condition D.1.1 will be demonstrated.

Thus, the compliance stack testing requirement shall be amended as follows to include the new testing requirement and the solids content limits and record keeping requirements of Condition D.1.5 will be removed.

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period within 90 days after the issuance of this permit, in order to demonstrate compliance with Condition D.1.1, the Permittee shall perform PM testing of one (1) EnterVan line and One (1) Bus/ParaTransit Van line utilizing methods as approved by the Commissioner.

This PM test needs to be performed on the Bus/ParaTransit Van line while a bus is being painted and also while a paratransit van is being painted. ~~This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.~~

The owner or operator may use existing compliance stack test data to satisfy the testing requirements of this Condition provided said test results are deemed acceptable by the Office of Air Quality.

Should the owner or operator change any "as applied" coating applied at any unit subject to the requirements of Condition D.1.1 such that the solids content of said coating exceeds the levels utilized in the most recent accepted compliance stack tests, the owner or operator shall schedule and perform new compliance stack tests utilizing the methodologies specified in this Condition, and demonstrate compliance with the requirements of Condition D.1.1 before any such change in coating is made.

The compliance stack tests required in this Condition shall be performed no later than five (5) years from the date of the most recent previous valid compliance demonstration, with said testing being conducted in accordance with Section C - Performance Testing.

~~D.1.5 Coating Solids Content~~

~~Pursuant to 326 IAC 2-1.1-11, the solids content of the coatings applied at EnterVan Lines 1 and 2 and Bus/ParaTransit Van Lines 1 and 2 shall be limited as follows:~~

- ~~(a) the solids content at each assembly area (Enter/Assem. No. 1, Enter/Assem. No. 2, Para/Assem. No. 1, and Para/Assem. No. 2) shall be limited to 3.10 pounds solids per gallon coating as applied;~~
- ~~(b) the solids content at each refinishing area (Enter/Ref. No. 1, Enter/Ref. No. 2, Para/Ref. No. 1, and Para/Ref. No. 2) shall be limited to 7.60 pounds solids per gallon coating as applied; and~~
- ~~(c) the solids content at each undercoating area (Enter/Un. No. 1, Enter/Un. No. 2, Para/Un. No. 1, and Para/Un. No. 2) shall be limited 4.46 pounds solids per gallon coating as applied.~~

~~The records required in this Condition shall be maintained in accordance with Section C - General~~

~~Record Keeping Requirements of this permit. Any changes to the coatings applied at the EnterVan Lines and Bus/ParaTransit Van Lines specified in this condition that exceed the specified solids content limits shall obtain approval from the Office of Air Quality before such changes are made.~~

Issue 5:

The Braun Corporation agrees to keep the solids limit of Condition D.1.5(b) and its associated record keeping requirements, but only of the five (5) highest solids coatings, as applied.

Response 5:

The Braun Corporation has stated that they did not want any solids content limits or record keeping requirements, but would agree to meet the solids content limits of Condition D.1.5. By changing the compliance stack testing requirements as described in Issue 4, no limits or record keeping are required. Thus, the remaining solids content limits and the record keeping requirements shall be removed.

After removal of all conditions and changes made to the other conditions, each Condition shall be renumbered accordingly.